

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

Case
10-bk-00137-BKT
Vicky Rodríguez-Torres v.
Mariela Rexach-Rexach

Exhibit
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In re: Vicky Rodríguez-Torres
Debtor

Vicky Rodríguez-Torres
Plaintiff

v.

Enid López-López
Guillermo Camba-Casas
Mariela Rexach-Rexach
Government Development Bank PR, et al.
Defendants

09-10864-BKT7
Chapter 7

ADVERSARY PROCEEDING
10-00137-BKT

18 U.S.C. § 1030,
18 U.S.C. § 2510,
18 U.S.C. § 2701,
42 U.S.C. § 1983,
42 U.S.C. § 1985,
42 U.S.C. § 1988,
TORTS

DISCOVERY PLAN PURSUANT TO FED. R. CIV. P. 26(f)

Pursuant to **Fed. R. Civ. P.26(f)** - made applicable to bankruptcy proceedings by **Fed. R. Bankr. P.7026** - Debtor hereby submits her Discovery Plan in accordance with **P.R. LBR 7026-1(a)** :

1. Debtor confirms that the parties have made all initial disclosures under **Fed. R. Bankr. P. 7026(a) (1)** by October 15th, 2010.
2. Debtor intends to conduct discovery concerning the following subjects:
 - a. Conspiracy to deliberately and willfully destroy evidence between all co-defendants;
 - b. Negligent and gross negligent spoliation of evidence;
 - c. Obstruction of justice and interference with Debtor's civil actions;

- d. Abuse of computer access rights to alter electronic communications and prevent the subsequent legitimate access to the same;
- e. GDB's Electronic Messaging And Collaboration Architecture, hosted by the Microsoft Exchange Server 2003 Enterprise Edition software:
 - 1. Access definition for Mailboxes;
 - 2. Definition of Organizations, Administrative Groups and Data Storage;
 - 3. User and Contact administration;
 - 4. Mailbox administration and parameterization of: Delivery Restrictions, Permissions, Storage Limits, Deleted Item Retention;
 - 5. Definition of Security and Distribution Groups;
 - 6. Directory Security and Control;
 - 7. Auditing and Auditable Events;
 - 8. Definition of Recipient Policies;
 - 9. Definition of Store Policies;
 - 10. Controlling the Information Store and Indexing;
 - 11. Backup and Recovery Plan;
 - 12. Global Settings for Group, Administration, and Organization Containers;
 - 13. Monitoring, Logging, and Tracking of Messages.
- f. GDB's computer and data control security policies and procedures, including, but not limited to Microsoft Windows Server 2003;

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- i. Deposition of GDB 30(b)(6) witness on Exchange Server Management taken the week ending on: January 28th, 2011;
 - j. Deposition of GDB 30(b)(6) witness on Computer and Data Security taken the week ending on: January 28th, 2011;
 - k. Deposition of GDB 30(b)(6) witness on Legal Compliance taken the week ending on: January 28th, 2011.
4. Deadline to join other parties or amend the pleadings: November 5th, 2010.
5. Deadline to file dispositive and pre-trial motions: February 25th, 2011.
6. Joint Pretrial Order will be filed on or before: November 26th, 2010.
7. Debtor believes that referral of this matter for mediation would not be helpful.
8. Debtor believes that a Pretrial conference would not be helpful.

Submitted in New York, New York, this 15th day of October, 2010.

S/William E. Meléndez Menéndez
William E. Meléndez Menéndez
USDC PR No. 226902

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this date I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system

which will send notification of such filing to all parties in
interest.

In New York, New York, this 15th day of October, 2010.

S/William E. Meléndez Menéndez

William E. Meléndez Menéndez

USDC PR No. 226902